

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

A high-contrast, black and white image showing a series of thick, horizontal black bars of varying lengths arranged in a stepped pattern against a white background. The bars are set against a dark, textured background. The pattern consists of five horizontal bars in total, with the first bar being the longest and the fifth being the shortest. The bars are positioned in a staggered, non-linear fashion, creating a sense of depth and movement. The overall effect is minimalist and abstract.

## TONY LEE WILKINSON (10)

A high-contrast, black and white image showing a series of horizontal bars of varying lengths, creating a stepped or ladder-like pattern. The bars are white on a black background, with some bars having internal black segments. The pattern is centered and repeats vertically.

SEALED

No. 4:20CR

Judge Mazzant

FILED  
MAR 12 2020  
Clerk, U.S. District Court  
Texas Eastern

## INDICTMENT

## THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Manufacture and Distribute Methamphetamine)

That from sometime on or about January 2018, and continuously thereafter up to and including March 11, 2020, in the Eastern District of Texas and elsewhere,

## **Tony Lee Wilkinson**

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to manufacture and distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 18 U.S.C. § 924(c)  
(Possession of a Firearm in Furtherance  
of a Drug Trafficking Crime)

On or about January 10, 2020, within the Northern District of Texas, [REDACTED]

[REDACTED] defendant, did knowingly possess a firearm, namely, a Stoeger Cougar 9mm handgun, Serial Number T6429-14A01242, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture and distribute methamphetamine.

In violation of 18 U.S.C. § 924(c).

**Count Three**

Violation: 18 U.S.C. § 924(c)  
(Possession of a Firearm in Furtherance  
of a Drug Trafficking Crime)

On or about December 26, 2019, within the Northern District of Texas, [REDACTED]

[REDACTED] defendant, did knowingly possess firearms, namely, a Smith and Wesson Model SD-9, 9mm handgun, Serial Number FBA7223, and

a Pistolet Automatique Brevete Model D, 7.65mm handgun, Serial Number D5803, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture and distribute methamphetamine.

In violation of 18 U.S.C. § 924(c).

**Count Four**

Violation: 18 U.S.C. § 924(c)  
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 10, 2020, within the Northern District of Texas, [REDACTED]

[REDACTED] defendant, did knowingly possess a firearm, namely, a Taurus PT145, .45 caliber handgun, Serial Number NWG89578, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture and distribute methamphetamine.

In violation of 18 U.S.C. § 924(c).

**Count Five**

Violation: 18 U.S.C. § 924(c)  
(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about January 29, 2020, within the Northern District of Texas, [REDACTED]

[REDACTED] defendant, did knowingly possess a firearm, namely, a Smith and Wesson, 9mm handgun, Serial Number FXZ3234, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, to wit: conspiracy to possess with the intent to manufacture and distribute methamphetamine.

In violation of 18 U.S.C. § 924(c).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 21 U.S.C. § 853, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

\$7,1240.00 in U.S. currency seized from [REDACTED]  
[REDACTED]

A TRUE BILL

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GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY

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ERNEST GONZALEZ  
Assistant United States Attorney

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Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

SEALED

No. 4:20CR  
Judge

## TONY LEE WILKINSON (10)

A high-contrast, black and white graphic image showing a series of vertical bars of varying heights, resembling a histogram or a step function. The bars are white on the right and black on the left, set against a dark background. The image is oriented vertically on the page.

**Count One**

Violation: 21 U.S.C. § 846

Penalty: If 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine or 50 grams or more of methamphetamine (actual) -- not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least five years.

Special Assessment: \$100.00

## **Counts Two, Three, Four and Five**

Violation: 18 U.S.C. § 924(c)

Penalty: Imprisonment for not more than five years to be served consecutive with any other term; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Special Assessment: \$100.00